

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 23-20201  
Hon. Judith E. Levy

-vs.-

RONALD NORVALE WILLIAMS,

Defendant.

First Supplemental Brief in  
Support of Motion to  
Dismiss Indictment

---

United States of America

By: Myra Din  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, Michigan 48226  
(313) 226-9100  
[myra.din@usdoj.gov](mailto:myra.din@usdoj.gov)

---

Federal Community Defender Office

By: Brandy Y. Robinson  
Attorney for Ronald Williams  
613 Abbott, Suite 500  
Detroit, Michigan 48226  
(313) 967-5542  
[brandy\\_robinson@fd.org](mailto:brandy_robinson@fd.org)

---

**FIRST SUPPLEMENTAL BRIEF**

In response to the Court's July 25, 2023 order, Ronald Williams files this supplemental brief to clarify that his *Bruen* motion challenges the constitutionality of 18 U.S.C. § 922(g)(1) as applied to him. His three felony convictions stem from a single incident thirty-six (36) years ago, when Mr. Williams fatally shot two people.<sup>1</sup> He was seventeen (17) years old at the time.

---

<sup>1</sup> According to state presentence reports, the shooting happened at 12:30 a.m. on January 20, 1987.

A jury convicted Mr. Williams of one count of first-degree murder, one count of second-degree murder, and a single count of felony-firearm. And because the law in 1987 permitted it, the trial court punished Mr. Williams with a mandatory sentence of non-parolable life for first-degree murder.<sup>2</sup>

In 2016, however, he was resentenced following the Supreme Court's decision in *Miller v. Alabama*, 567 U.S. 460 (2012).<sup>3</sup> After evaluating Mr. Williams' remarkable growth and rehabilitation during his 29 years in prison, the original trial judge converted his life sentence to a term of 25-60 years.

Mr. Williams began serving a four-year parole term on December 3, 2019. But on March 2, 2023 – just nine months short of being released – Mr. Williams was arrested and charged with the pistol that forms the basis of the indictment at issue here.

The defense submits that notwithstanding his decades-old felonies, Mr. Williams remains part of “the people” as referenced throughout the Constitution, and that the Second Amendment applies to his conduct of possessing a firearm. The government must affirmatively prove that, as applied to Mr. Williams, 18 U.S.C. § 922(g)(1) is part of a historical tradition that restricts the right to keep and bear arms.

---

<sup>2</sup> Mr. Williams received a parolable life sentence for the second-degree murder conviction. Both of those prison terms were set to run consecutive to a two-year penalty for felony-firearm.

<sup>3</sup> The *Miller* court held that for children under the age of 18 at the time of their crimes, mandatory life imprisonment without parole violates the Eighth Amendment's prohibition on cruel and unusual punishment.

As directed by the Court's July 25<sup>th</sup> order, the defense will provide additional analysis on these issues in the coming weeks.

Respectfully submitted,

**FEDERAL COMMUNITY DEFENDER  
EASTERN DISTRICT OF MICHIGAN**

s/Brandy Y. Robinson  
BRANDY Y. ROBINSON (P66895)  
Attorney for Ronald Williams  
613 Abbott Street, Suite 500  
Detroit, Michigan 48226  
(313) 967-5852  
E-mail: brandy\_robinson@fd.org

Dated: August 8, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2023, I electronically filed the above document with the Clerk of the Court using the CMECF filing system, which will send notification of the filing to opposing counsel of record.

/s/ Brandy Y. Robinson